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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of:

Rulemaking to Permit Use
of the 76-77 GHz Band for
Vehicle Radar Systems

)
) RM-8308
)
) DA 94-152
)

Comments of Rockwell International Corporation

Pursuant to Section 1.405 of the Commission Rules [47 CFR Sec. 1.405(b) (1992)] Rockwell International Corporation ("Rockwell") hereby comments on the late-filed comments of the American Automobile Manufacturers Association (AAMA) in response to the General Motors Research Corporation (GM) Petition for Rulemaking identified above. An original and nine copies of these comments are enclosed.

Rockwell is a well-known and established manufacturer of automotive vehicle components, including automotive electronics products. Rockwell is developing forward-looking radar systems for vehicles for the worldwide market, as well as other products for the Intelligent Vehicle Highway Systems (IVHS) environment. Rockwell agrees with the AAMA that there is a current need for safety-related radar RF spectrum allocations to allow development of such systems in a cost-effective and efficient manner and supports, for the reasons stated, the GM spectrum allocation request at 76-77 GHz.

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Because of the proposed acceptance in Europe, Rockwell believes that it is essential that the 76-77 GHz band be allocated in the United States in order to allow companies developing radar systems to maximize efficiencies and control costs for systems for use in both the European and U.S. markets. These systems are expensive to develop and a common approach to spectrum use will allow savings from the non-duplicative efforts to be reflected in the cost of the product. Rockwell believes it is important to price such systems as competitively as possible in order to allow for the broadest use of these products to enhance highway safety.

Rockwell also supports the AAMA proposal that additional spectrum be allocated in the same rulemaking to allow greater flexibility in designing and building vehicle radar systems that will not only be capable of providing safety benefits for the public but will allow the broadest range of price options for those products. It is best to accomplish this task in a single rulemaking proceeding than to do it by a piecemeal approach, thus allowing development of the radar systems to proceed faster and with greater certainty.

With respect to frequencies enumerated in the AAMA filing in addition to 76-77 GHz, Rockwell believes that a rulemaking is the proper place to determine which additional frequencies may be required for the systems currently under development or planned for development not only by the members of the AAMA but by other automotive vehicle component and electronics manufacturers as well. Companies other than AAMA members are developing vehicle radars and those products' spectrum

requirements may differ from those being developed by AAMA member companies. The maximum number of systems must be allowed to reach the market in order to provide the public with the best quality and most competitively priced products.

Accordingly, Rockwell supports the GM Petition for Rulemaking in the 76-77 GHz bands and the AAMA recommendation to expand the rulemaking to include additional frequencies for safety-related RF spectrum allocations. This would allow both AAMA member companies and others to proceed with the development of vehicular radar on a more certain basis.

Copies of this filing are being sent to the Service List.

Respectfully submitted,

ROCKWELL INTERNATIONAL CORPORATION

By 

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enclosures

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